1	Your name: L. C. Chappell	
2	Address: PO Box 1411	
3	Morgan Hill, CA 95037  Phone Number: 4082036149	
4		
5	E-mail Address: chappellconsulting@hotmail.	com
6	Pro se	*
7		
8	UNITED STAT	ES DISTRICT COURT
9	NORTHERN DISTRICT OF CALIFORNIA	
10	Division [check one]: ☑ San Francisco ☐ Oakland ☐ San Jose ☐ Eureka	
11		
12	L. C. Chappell	) Case Number: <u>19-30088</u>
13		) )
14	Plaintiff,	OPPOSITION TO MOTION TO DISMISS
15	vs.	
16	PG&E Corporation, and	DATE: 7/14/2021
17	Pacific Gas and Electric Company	TIME: 9:00 Am
18		JUDGE: Hon. Dennis Montali
19		) )
20	,	) )
21	Defendant.	)
22		
23		
24		
25		
26		
27   28		
40		
	OPPOSITION TO MOTION TO DISMISS CASE NO.: 19-30088	; PAGE 1 OF 4 [JDC TEMPLATE – rev. 2017]

## FACTUAL BACKGROUND [Write a short version of the facts in the Complaint. After each fact, write in the paragraph number of the Complaint where that information can be found.] PG&E Corporation ("PG&E Corp.") and Pacific Gas and Electric Company (the "Utility"), objections to the Proofs of Claims to be disallowed and expunged form claimant L. C. Chappell should be disallowed. Exhibit 1B page 1, line 3 (\$268,300). OPPOSITION TO MOTION TO DISMISS ; PAGE $\frac{2}{}$ OF $\frac{4}{}$ [JDC TEMPLATE – rev. 2017] CASE NO.: 19-30088

## **ARGUMENT** [Explain your response to each of Defendant's arguments. Go in the same order as the arguments were made in Defendant's Motion, if possible.] Defendant's argument is "Barred by previous settlement agreement". Exhibit 1B page 1, line 3 The settlement agreement between Defendant and Plaintiff is dated October 27, 2017. The claim by Plaintiff is related to discrimination by Defendant's managers for contractor positions from July 2019. Settlement agreement does not apply to this claim. OPPOSITION TO MOTION TO DISMISS ; PAGE $\frac{3}{}$ OF $\frac{4}{}$ [JDC TEMPLATE – rev. 2017] CASE NO.: 19-30088

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<del>,</del> .
[If this document is longer than ten pages, you must include a table of contents and a table of authorities.]
[You must sign and date.]
Date: 7/13/2021 Sign Name:
Print Name: L. C. Chappell
OPPOSITION TO MOTION TO DISMISS CASE NO.: 19-30088  ; PAGE 4 OF 4 [JDC TEMPLATE - rev. 2017]
, 11.02

	Latin Diamita		
	Justice Diversity  CENTER OF THE BAR ASSOCIATION OF SAN FRANCISCO		
1 2	* You must serve each document you file by sending or delivering to the opposing side. Complete this form, and include it with the document that you file and serve.*		
3	1. Case Name: L. C. Chappell v. PG&E Corporation, and		
4	2. Case Number: 19-30088		
5	3. What documents were served?		
6	Opposition to Motion to Dismiss		
7	4. How was the document served? [check one]		
8	Placed in U.S. Mail		
9	Hand-delivered		
10	Sent for delivery (e.g., FedEx, UPS)		
11	Sent by fax (if the other party has agreed to accept service by fax)		
12	5. Who did you send the document to? [Write the full name and contact information for each person you sent the document.]		
13	KELLER BENVENUTTI KIM LLP		
14	650 California Street, Suite 1900		
15	San Francisco, CA		
16	San Francisco, CA		
17			
18	6. When were the documents sent? $\frac{7/13/2021}{}$		
20	7. Who served the documents? [Whoever puts it into the mail, faxes, delivers or sends for delivery should sign, and print their name and address. You can do this yourself.]		
21	I declare under penalty of perjury under the laws of the United States that the foregoing		
22	is true and correct.		
23	Signature:		
24	Name: L. C. Chappell		
25	Address: PO Box 1411		
26	Morgan Hill, CA 95037		
27			
28			
	CERTIFICATE OF SERVICE [JDC TEMPLATE Rev. 05/2017]		

Case: 19-30088 Doc# 10919 Filed: 07/14/21 Entered: 07/14/21 10:44:23 Page 5 of 5